<u>REMARKS</u>

[0002] Applicant respectfully requests reconsideration and allowance of all of the

claims of the application. The status of the claims is as follows:

Claims 24-30, 33-36, 48-53, 58-60, 62 and 65 are currently pending

Claim 65 is canceled herein

Claims 24, 48, 58 and 62 are amended herein

[0003] Claims 24, 48, 58 and 62 are amended to include subject matter from

dependent claim 65.

Specification Objections

[0004] The Specification stands objected to as allegedly not providing sufficient

antecedent basis for the claimed subject matter. The specification is specifically

objected to for allegedly lacking the necessary support for the terms "computer-readable

media" and "computing device." (See action page 3). Applicant respectfully traverses

the Examiner's objection. Both these terms are clearly supported in the specification at

page 14, line 21 through page 15, line 10. Applicant respectfully requests that the

Examiner withdraw this objection.

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Cited Documents

[0005] The following documents have been applied to reject one or more claims of

the Application:

Simonetti: Simonetti, U.S. Patent No. 5,295,261

Boulton: Boulton et al., U.S. Patent No. 5,566,291

Wang: Wang, U.S. Patent No. 5,539,922

• Eldridge: Eldridge et al., U.S. Patent No. 6,421,716

Claims 24-28, 30 and 62 Are Non-Obvious Over Simonetti in view of

Boulton and in further view of Wang

[0006] Claims 24-28, 30 and 62 stand rejected under 35 U.S.C. § 103(a) as allegedly

being obvious over Simonetti in view of Boulton and in further view of Wang. Applicant

respectfully traverses the rejection.

Independent Claim 24

[0007] In light of the amendments presented herein, Applicant submits that the

rejection of independent claim 24 is moot. Specifically, the combination of Simonetti,

Boulton and Wang does not teach or suggest that "the at least one second hierarchical

tree structures comprise a plurality of nodes, wherein each node is assigned an

organization-specific proprietary identifier." This element is clearly not taught or

suggested by the cited art. This element has been incorporated from dependent claim

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65. Additional support for this claim element can be found at least at pages 26 and 27

of the present application.

[0008] As the Examiner failed to address this claim element in the Office Action

mailed May 06, 2009, Applicant make the assumption that the Examiner agrees that the

cited references do not teach or suggest these additional elements and features.

Consequently, the combination of Simonetti, Boulton and Wang does not teach or

suggest all of the elements and features of this claim. Accordingly, Applicant

respectfully requests that the rejection of this claim be withdrawn.

Dependent Claims 25-30 and 33-36

[0009] Claims 25-30 and 33-36 ultimately depend from independent claim 1. As

discussed above, claim 1 is allowable over the cited documents. Therefore, claims 25-

30 and 33-36 are also allowable over the cited documents of record for at least their

dependency from an allowable base claim. These claims may also be allowable for the

additional features that each recites.

Independent Claim 62

[0010] In light of the amendments presented herein, Applicant submits that the

rejection of independent claim 62 is moot. Specifically, the combination of Simonetti,

Boulton and Wang does not teach or suggest that "the at least one second hierarchical

tree structures comprise a plurality of nodes, wherein each node is assigned an

organization-specific proprietary identifier." This element is clearly not taught or

suggested by the cited art. This element has been incorporated from dependent claim

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 $\,$  65. Additional support for this claim element can be found at least at pages 26 and 27  $\,$ 

of the present application.

[0011] As the Examiner failed to address the dependent claim 65 in the Office Action

mailed May 06, 2009, Applicant make the assumption that the Examiner agrees that the

cited references do not teach or suggest these additional elements and features.

Consequently, the combination of Simonetti, Boulton and Wang does not teach or

suggest all of the elements and features of this claim. Accordingly, Applicant

respectfully requests that the rejection of this claim be withdrawn.

Claims 48-49 and 58-60 Are Non-Obvious Over Simonetti in view of Wang

[0012] Claims 48-49 and 58-60 stand rejected under 35 U.S.C. § 103(a) as allegedly

being obvious over Simonetti in view of Wang. Applicant respectfully traverses the

rejection.

Independent Claim 48

[0013] In light of the amendments presented herein. Applicant submits that the

rejection of independent claim 48 is moot. Specifically, the combination of Simonetti

and Wang does not teach or suggest "each node of the second hierarchical tree

structure being assigned an organization-specific proprietary identifier." This element is

clearly not taught or suggested by the cited art. This element has been incorporated

from dependent claim 65. Additional support for this claim element can be found at

least at pages 26 and 27 of the present application.

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[0014] As the Examiner failed to address this claim element in the Office Action

mailed May 06, 2009, Applicant make the assumption that the Examiner agrees that the

cited references do not teach or suggest these additional elements and features.

Consequently, the combination of Simonetti and Wang does not teach or suggest all of

the elements and features of this claim. Accordingly, Applicant respectfully requests

that the rejection of this claim be withdrawn.

Dependent Claims 49-53

[0015] Claims 49-53 ultimately depend from independent claim 48. As discussed

above, claim 48 is allowable over the cited documents. Therefore, claims 49-53 are

also allowable over the cited documents of record for at least their dependency from an

allowable base claim. These claims may also be allowable for the additional features

that each recites.

Independent Claim 58

[0016] In light of the amendments presented herein, Applicant submits that the

rejection of independent claim 58 is moot. Specifically, the combination of Simonetti

and Wang does not teach or suggest that each individual node of the other tree

structure comprises "an organization-specific proprietary identifier." This element is

clearly not taught or suggested by the cited art. This element has been incorporated

from dependent claim 65. Additional support for this claim element can be found at

least at pages 26 and 27 of the present application.

[0017] As the Examiner failed to address this claim element in the Office Action

mailed May 06, 2009, Applicant make the assumption that the Examiner agrees that the

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cited references do not teach or suggest these additional elements and features.

Consequently, the combination of Simonetti and Wang does not teach or suggest all of

the elements and features of this claim. Accordingly, Applicant respectfully requests

that the rejection of this claim be withdrawn.

Dependent Claims 59-60

[0018] Claims 59-60 ultimately depend from independent claim 58. As discussed

above, claim 58 is allowable over the cited documents. Therefore, claims 59-60 are

also allowable over the cited documents of record for at least their dependency from an

allowable base claim. These claims may also be allowable for the additional features

that each recites.

Conclusion

[0019] Applicant respectfully requests reconsideration and prompt issuance of the

application. If any issues remain that prevent issuance of this application, the Examiner

is urged to contact the undersigned representative for the Applicant before issuing a

subsequent Action.

Respectfully Submitted,

Lee & Hayes, PLLC

Representative for Applicant

/Jason F. Lindh Reg. No. 59,090/

Dated: 2009-07-01

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